

Forwarded to WMSA 2/7/03

(54)
RB 2/7/03

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA**

BEVERLY BEAM,

Plaintiff

vs.

**SCOTT DOWNEY, ROGER
MORRISON, DAVID GRAYBILL
AND MICHAEL SWEGER,**

Defendants

CIVIL ACTION LAW

NO. 1:CV-01-0083

(JUDGE MCCLURE)

**FILED
HARRISBURG**

FEB 06 2003

**MARY E. D'ANDREA
Per 95**

**PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO THE DEFENDANTS DOWNEY,
SWEGER AND GRAYBILL'S MOTION FOR
ATTORNEYS FEES**

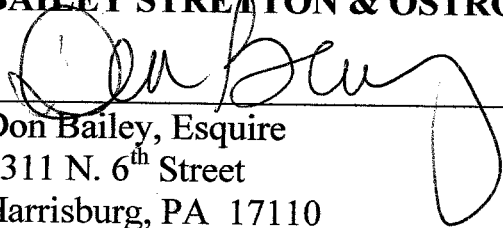
- 1.) On or about February 7, 2003 plaintiffs Brief in Opposition would be due.
- 2.) Plaintiff's counsel has been in trial in Wilkes Barre in front of the Honorable Albert Caputo for the last week and is unable to adequately prepare an answer in response to Defendants Motion for Attorneys Fees.
- 3.) Counsel is requesting a 10-day enlargement of time to respond to Defendants Motions for Attorneys Fees.

4.) Opposing counsel was contacted and he concurs with this request.

WHEREFORE this Court is respectfully requested to grant the plaintiff a ten-day enlargement of time to respond to the Defendant Motion for Attorney Fees in the above captioned matter.

RESPECTFULLY SUBMITTED,

BAILEY STRETTON & OSTROWSKI

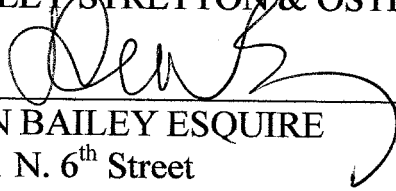


Don Bailey, Esquire
4311 N. 6th Street
Harrisburg, PA 17110
(717) 221-9500

CERTIFICATE OF CONCURRENCE

I, Don Bailey do hereby state that I contacted opposing counsel and requested their concurrence with this motion. Counsel graciously concurs in this motion.

BAILEY STRETTON & OSTROWSKI

A handwritten signature in black ink, appearing to read 'Don Bailey', is written over a horizontal line.

DON BAILEY ESQUIRE

4311 N. 6th Street

Harrisburg, PA 17110

(717) 221-9500

CERTIFICATE OF SERVICE

I, Don Bailey do hereby state that I served on this 5th day of February 2003 a copy of **ENLARGMENT OF TIME** by U.S. Mail first class, postage prepaid to the following attorney listed below:

P. Daniel Altland, Esquire
Metter Evans & Woodside
3401 N. Front Street
Harrisburg, PA 17110

Stephen Russell, Esquire
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